

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

STATE DEFENDANTS' NOTICE OF FILING
DISCOVERY DISPUTE DOCUMENT

Pursuant to this Court's Order on discovery disputes, [Doc. 1359], State Defendants file their document with the checkboxes filled in on the following pages.

This 7th day of April, 2022.

Vincent R. Russo
Georgia Bar No. 242628
vrusso@robbinsfirm.com
Josh Belinfante
Georgia Bar No. 047399
jbelinfante@robbinsfirm.com
Carey A. Miller
Georgia Bar No. 976240
cmiller@robbinsfirm.com
Alexander Denton
Georgia Bar No. 660632
adenton@robbinsfirm.com

Robbins Ross Alloy Belinfante
Littlefield LLC
500 14th Street, N.W.
Atlanta, Georgia 30318
Telephone: (678) 701-9381
Facsimile: (404) 856-3250

/s/Bryan P. Tyson

Bryan P. Tyson
Georgia Bar No. 515411
btyson@taylorenghish.com
Jonathan D. Crumly
Georgia Bar No. 199466
jcrumly@taylorenghish.com
James A. Balli
Georgia Bar No. 035828
jballi@taylorenghish.com
Diane F. LaRoss
Georgia Bar No. 430830
dlaross@taylorenghish.com
Bryan F. Jacoutot
Georgia Bar No. 668272
bjacoutot@taylorenghish.com
Loree Anne Paradise
Georgia Bar No. 382202
lparadise@taylorenghish.com
TAYLOR ENGLISH DUMA LLP
1600 Parkwood Circle, Suite 200
Atlanta, GA 30339
Telephone: 678-336-7249

Counsel for State Defendants

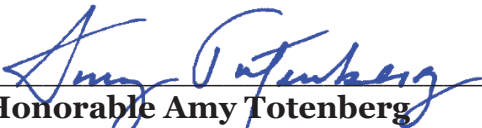
Discovery Dispute	Whether the dispute has been resolved:	Whether the dispute requires resolution before MSJ filings:
The State Defendants' and the Plaintiffs' dispute regarding the adequacy of the State's 30(b)(6) witnesses' deposition testimony	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The State Defendants' and the Plaintiffs' dispute regarding the State's production of certain investigative files	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The State Defendants' and the Plaintiffs' dispute regarding a 30(b)(6) deposition of Fortalice	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The State Defendants' and the Plaintiffs' dispute regarding depositions of Secretary of State Raffensperger and Deputy Secretary Fuchs	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The State Defendants' and the Coalition Plaintiffs' dispute regarding Dekalb and Fulton Counties' election records	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The Fulton County Defendants' and the Coalition Plaintiffs' dispute regarding the inspection of certain original paper ballots	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The State Defendants' and the Coalition Plaintiffs' dispute regarding the 30(b)(6) deposition of the Coalition	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The State Defendants' and the Coalition Plaintiffs' deposition dispute regarding the Coalition's associational standing witnesses	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
The State Defendants' request for discovery related to Dr. Halderman's methods	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Dr. Stark's Amended Expert
Report

Yes ☐
No ☒

Yes ☒
No ☐

IT IS SO ORDERED this 5th day of April, 2022.



Honorable Amy Totenberg
United States District Judge

L.R. 7.1(D) CERTIFICATION

I certify that this Notice has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Response has been prepared using 13-pt Century Schoolbook font.

/s/ Bryan P. Tyson
Bryan P. Tyson